

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 7

TEAM SYSTEMS INTERNATIONAL, LLC,

Debtor.

Case No. 22-10066 (CTG)

***SECOND AMENDED*¹ NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON SEPTEMBER 14, 2022 AT 1:00 P.M.**

**THIS MATTER WILL BE TAKING PLACE IN-PERSON.
ALL PARTIES AND WITNESSES ARE EXPECTED TO APPEAR IN PERSON
UNLESS PERMITTED TO APPEAR VIA ZOOM.**

Appearances at in-person court proceedings using Zoom are allowed only in the following circumstances: (i) a party who files a responsive pleading intends to make only a limited argument; (ii) a party who has not submitted a pleading but is interested in observing the hearing; (iii) a party who has a good faith health-related reason and has obtained permission from Judge Goldblatt's chambers to appear remotely, or (iv) other extenuating circumstances as determined by Judge Goldblatt.

Zoom registration link:

<https://debuscourts.zoomgov.com/meeting/register/vJltcOmqqT4sHFVmonUm5OOmKHMLz6kjrwc>

UNCONTESTED MATTERS FOR WHICH AN ORDER HAS BEEN ENTERED:

1. Motion to Strike Portions of GPDEV, LLC and Simons Exploration, Inc.'s Motion to Alter and/or Amend the Order Adjudicating Motion to Resolve Disputed Election (filed on August 17, 2022) [D.I. [238](#)]

Response Deadline: August 31, 2022

Response Received: None

Related Documents:

- a. Certificate of No Objection (filed on September 1, 2022) [D.I. [246](#)]

¹ Amended items appear in boldfaced or italicized type.

- b. Order Granting Motion to Strike Portions of GPDEV, LLC and Simons Exploration, Inc.'s Motion to Alter and/or Amend the Order Adjudicating Motion to Resolve Disputed Election (entered on September 8, 2022) [D.I. [248](#)]

Status: An Order has been entered. Accordingly, no hearing is necessary.

- 2. Motion for Entry of an Order Authorizing the Chapter 7 Trustee to Retain and Compensate Experts in Connection with FEMA Claims Litigation (filed on August 25, 2022) [D.I. [244](#)]

Response Deadline: September 7, 2022

Response Received: None

Related Documents:

- a. Certificate of No Objection (filed on September 8, 2022) [D.I. [249](#)]
- b. Order Authorizing the Chapter 7 Trustee to Retain and Compensate Experts in Connection with FEMA Claims Litigation (entered on September 9, 2022) [D.I. [250](#)]

Status: An Order has been entered. Accordingly, no hearing is necessary.

MATTERS GOING FORWARD:

- 3. GPDEV, LLC and Simons Exploration, Inc.'s Motion to Alter and/or Amend the Order Adjudicating Motion to Resolve Disputed Election (D.I. 228) (filed on August 11, 2022) [D.I. [237](#)]

Response Deadline: August 25, 2022

Responses Received:

- a. Objection of the United States Trustee to GPDEV, LLC and Simons Exploration, Inc.'s Motion to Alter and/or Amend the Order Adjudicating Motion to Resolve Disputed Election [D.I. 237] (filed on August 25, 2022) [D.I. [241](#)]
- b. Objection of the Chapter 7 Trustee to GPDEV, LLC and Simons Exploration, Inc.'s Motion to Alter and/or Amend the Order Adjudicating Motion to Resolve Disputed Election (D.I. 228) (filed on August 25, 2022) [D.I. [242](#)]

- c. Joinder of Deborah Mott and Steven Acosta to Objections to GPDEV, LLC and Simons Exploration, Inc.'s Motion to Alter and/or Amend the Order Adjudicating Motion to Resolve Disputed Election (filed on August 25, 2022) [D.I. [243](#)]

Related Documents: None

Status: This matter is going forward.

ADJOURNED MATTER:

4. Motion to Compel Trustee to File Notice Confirming Receipt of Documents (filed on August 18, 2022) [D.I. [239](#)]

Response Deadline: September 1, 2022

Responses Received:

- a. Objection of the Chapter 7 Trustee to Motion of Insiders to Compel Trustee to File Notice Confirming Receipt of Documents (filed on September 1, 2022) [D.I. [245](#)]
- b. Reply of Deborah Mott and Steven Acosta in Support of Motion to Compel Trustee to File Notice Confirming Receipt of Documents (filed on September 9, 2022) [D.I. [251](#)]

Related Documents:

- a. Notice of Deposition (filed on September 2, 2022) [D.I. [247](#)]
- b. **Trustee's Witness and Exhibit List for Hearing on Motion to Compel on September 14, 2022 (filed on September 13, 2022) [D.I. [254](#)]**

Status: **This matter is adjourned to a future date by agreement of the parties.**

Dated: September 13, 2022

ARCHER & GREINER, P.C.

/s/ David W. Carickhoff

David W. Carickhoff (No. 3715)
300 Delaware Avenue, Suite 1100
Wilmington, DE 19801
Tel: (302) 777-4350
Fax: (302) 777-4352
E-mail: dcarickhoff@archerlaw.com

Counsel to the Chapter 7 Trustee